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## R E M A R K S

Reconsideration of the present application in view of the amendments and following remarks is respectfully requested. Claims 9 and 10 have been amended. Twenty-seven claims are pending in the application: Claims 1 through 27.

### Claim Objections

1. Claim 9 stands objected to for reciting "said data" because it was not clear to the Examiner what data is being referred to.

Claim 9 depends upon claim 1. Claim 1 recites "receiving <u>data</u> indicative of a selected server-side system and a selected client-side system between which a VPN is to be established." This is the only "data" referred to in claim 1, thus, "said data" refers back to the data recited in claim 1. Applicant has amended claim 9 in order to further clarify what data is being referred to in claim 9. Applicants submit that no narrowing amendment has been made. Further no narrowing amendment is intended. Thus, the objection is overcome.

2. Claim 10 stands objected to for reciting "said transmitting step" instead of "automatically transmitting."

Applicant has amended the claim 10 as suggested by the Examiner. Thus, the objection is overcome.

### 35 U.S.C. ' 102

3. Claims 1-22 and 25-27 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Application No. 2002/0178361 (*Genty et al.*).

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M.P.E.P Section 2131 states that "a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference."

Genty et al. disclose a Virtual Private Network (VPN) that includes a system and method for dynamically determining a Certificate Revocation List (CRL) location and protocol. The CRL is a list of subscribers paired with digital certificate status. The list enumerates revoked certificates along with the reason(s) for revocation. The dates of certificate issue, and the entities that issued them, are also included. In addition, each list contains a proposed date for the next release. When a potential user attempts to access a server, the server allows or denies access based on the CRL entry for that particular user. The Examiner has cited much of the background in Genty et al. in order to support the present rejection. Namely, the Examiner has cited paragraph's 0015-0018 to support the rejection of claims 1, 13, and 18. This section of Genty et al. teaches general characteristics of many VPNs. Specifically, paragraph 0015 discloses features of the Internet Security Protocol. Paragraphs 0016-0018 disclose the concept of tunneling as used in a VPN.

In contrast, Applicants' claim 1 recites "automatically determining security setting for said client-side system based at least partially on said data; and automatically transmitting VPN configuration details to said client-side system, where said VPN configuration details include said security settings, such that in use said client-side system is automatically configured with said VPN configuration details to establish a secure VPN tunnel between said client-side system and said server-side system."

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The sections of *Genty et al.* cited by the Examiner describe security features and tunneling. However, these sections do not teach or suggest automatically configuring a client-side system in order to establish a secure VPN tunnel. The sections cited by the Examiner teach how tunneling is used to transfer data once a connection is already established and does not teach or suggest anything related to the automatic configuration of a client side system in a VPN. Tunneling of data is used once a VPN connection has been established and does not teach or suggest the recited elements of claim 1.

Furthermore, *Genty et al.* teaches dynamically determining a Certificate Revocation List (CRL) location and protocol. As described above the CRL is a list of subscribers paired with digital certificate status. The CRL is used to allow or deny access to a server based upon the CRL entry for a particular user. The dynamic determination of a CRL's location and protocol does not teach or suggest automatic configuration of a client side system in a VPN. Thus, *Genty et al.* does not teach or suggest "said client-side system is automatically configured with said VPN configuration details to establish a secure VPN tunnel between said client-side system and said server-side system," such as is claimed by Applicants.

Therefore, *Genty et al.* does not teach each and every element as set forth in claim 1 as required by M.P.E.P. section 2131. Thus, Applicant respectfully submits that claim 1 is not anticipated by *Genty et al.* Furthermore, claims 2-12 are also not anticipated by *Genty et al.* at least because of their dependency upon claim 1.

Similarly to claim 1, claim 13 recites "instructions for receiving data indicative of a selected server-side system

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and a selected client-side system between which a VPN is to be established; instructions for automatically determining security settings for said client-side system based at least partially on said data; and instructions for automatically transmitting VPN configuration details to said client-side system, where said VPN configuration details include said security settings." Thus, for the same reasons as stated above with reference to claim 1, claim 13 is also not anticipated by Genty et al. Furthermore, claims 14-17 are also not anticipated by Genty et al. at least because of their dependency upon claim 12.

Similarly to claim 1, claim 18 recites "receiving at a modem within said client-side system, VPN configuration details from a service provider system, where said VPN configuration details include security settings for establishing a VPN with a remote server-side system; and automatically configuring said modem, with said VPN configuration details, such that in use a secure VPN tunnel can be established between said client-side system and said server-side system." Similarly to as stated above, Genty et al. does not teach or suggest automatically configuring a modem with VPN configuration details. Thus, for the same reasons as stated above with reference to claim 1, claim 18 is also not anticipated by Genty et al. Furthermore, claims 19-21 are also not anticipated by Genty et al. at least because of their dependency upon claim 18.

Similarly to claim 1, claim 22 recites "a security generator for automatically determining security settings used to secure VPN communication between said client computer and said server; a VPN synchronizer for automatically configuring said modem with said security settings; and a modem synchronizer for automatically configuring said modem with said security

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settings." Similarly to as stated above, *Genty et al.* does not teach or suggest automatically configuring a modem. Thus, for the same reasons as stated above with reference to claim 1, claim 22 is also not anticipated by *Genty et al.* Furthermore, claims 23-27 are also not anticipated by *Genty et al.* at least because of their dependency upon claim 22.

Therefore, Applicants respectfully submit that all of the rejections are overcome and claims 1-22 and 25-27 are in condition for allowance.

## 35 U.S.C. '103

7. Claims 23 and 24 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Application No. 2002/0178361 (*Genty et al.*).
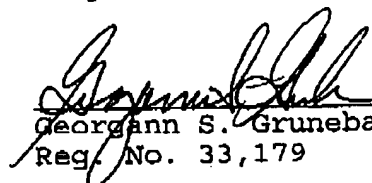
As stated above with reference to claim 22, *Genty et al.* does not teach or suggest the limitations of claim 22. Namely, *Genty et al.* does not teach or suggest "a security generator for automatically determining security settings used to secure VPN communication between said client computer and said server; a VPN synchronizer for automatically configuring said modem with said security settings; and a modem synchronizer for automatically configuring said modem with said security settings." Thus, claim 22 is not rendered obvious by *Genty et al.* Therefore, claims 23 and 24 are also not rendered obvious by *Genty et al.* at least for the reasons stated above. Thus, Applicants respectfully submit the rejection is overcome and claims 23 and 24 are in condition for allowance.

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# C O N C L U S I O N

In view of the above, Applicants submit that the pending claims are in condition for allowance, and prompt and favorable action is earnestly solicited. Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain any outstanding issues that require adverse action, it is respectfully requested that the Examiner telephone the undersigned at (310) 964-4615 so that such issues may be resolved as expeditiously as possible.

Respectfully submitted,

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